

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,)	
)	
v.)	1:14-cr-306-GBL-6
)	
OMAR DE JESUS CASTILLO,)	
Defendant.)	
_____)	

MOTION TO ADOPT CO-DEFENDANTS' MOTIONS

COMES NOW Defendant OMAR DE JESUS CASTILLO, by counsel, and moves this Honorable Court for leave to adopt and join the following Motions, amending them as needed so as to apply to Defendant CASTILLO:

1. Motion for Tender of Brady Information and Memorandum in Support (Dkt. 279, 280);
2. Motion for Attorney-Conducted Voir Dire and Memorandum in Support (Dkt. 309, 310);
3. Motion for Jury Questionnaire (Dkt. 319);
4. Motion for Severance & Memorandum of Law (Dkt. 320);
5. Motion to Direct the Government to Give Notice of Its Intention to Rely Upon Other Crimes Evidence and Memorandum in Support (Dkt. 324);
6. Motion and Memorandum of Law In Support of Defendant's Motion for Early Disclosure of Jencks Material and Brady/Giglio Material (Dkt. 325);
7. Motion to Authorize Reasonable Professional Visits (Dkt. 326);
8. Motion to Prevent Unauthorized Government Contact (Dkt. 327);
9. Motion to Reveal Identity of Confidential Informants (Dkt. 328);

10. Motion to Strike Alias (Dkt. 331);
11. Request for Preservation of Electronic Mail (Dkt. 332);
12. Motion for Order Directing the Government to Provide Impeachment Evidence as to All Hearsay Declarants (Dkt. 333);
13. Motion for Videorecording of All Foreign Speaking Witnesses, and Memorandum in Support (Dkt. 334, 335);
14. Motion for a Bill of Particulars (Dkt. 336);
15. Motion to Direct the Government to Give Notice of Its Intention to Rely Upon Other Crimes Evidence and Memorandum in Support (Dkt. 337);
16. Motion to Use a Jury Questionnaire and Memorandum in Support (Dkt. 338, 339);
17. Motion for the Production of Exculpatory Information (Dkt. 340);
18. Motion to Immediately Disclose Any and All Contact Between Government Agents or Prosecutors and Potential Jailhouse Informants Incarcerated with Defendant (Dkt. 344);
19. Motion for Disclosure of Rule 404 Evidence (Dkt. 346);
20. Motion to Compel Disclosure of Statements Made by Co-Defendants Which Incriminate Defendant (Dkt. 347);
21. Motion for Index of All Recordings/Phone Calls The Government Intends to Use At Trial (Dkt. 348);
22. Motion for a James Hearing (Dkt. 349);
23. Motion to Compel the Government to Disclose Subpoena Returns (Dkt. 350);
24. Motion to Direct the Government to Provide Statements of Co-Conspirators That It Does Not Intend To Call At Trial That Are Potentially Imputable To The Defendant

- If Admitted In Evidence Under The Hearsay Exception Of Fed. R. Evid.
801(D)(2)(E), and Memorandum In Support (Dkt. 352);
25. Motion for Immediate Tender of Giglio Materials, and Memorandum in Support
(Dkt. 353, 354);
26. Motion for Immediate Tender of Rule 404(B) Materials, and Memorandum in
Support (Dkt. 355, 356);
27. Motion for Discovery and Inspection and Exculpatory Evidence (Dkt. 357);
28. Motion for Designation of Recorded Telephone Calls That The Government Intends
to Seek to Use at Trial, and Memorandum in Support (Dkt. 359, 360);
29. Brady Discovery Motion for Investigative Materials Pertaining to the Park View
Locos Salvatruchas Clique of MS-13, and Memorandum in Support (Dkt. 361, 362);
30. Motion for Provision or Access to PSI and Plea Agreements of Co-Defendants or
Other Individuals Who Have Entered or Agreed to Enter Guilty Pleas in Exchange for
Testimony, and Memorandum in Support (Dkt. 367, 368);
31. Motion to Dismiss and Incorporated Memorandum in Support (Dkt. 369);
32. Motion for a Bill of Particulars and Incorporated Memorandum in Support (Dkt.
371);
33. Motion for Relief from Prejudicial Joinder and Incorporated Memorandum in Support
(Dkt. 372);
34. Motion for Leave to File Additional Motions (Dkt. 373);
35. Motion for Additional Peremptory Challenges (Dkt. 375).

Defendant reserves his right to join or adopt other motions filed in this case. This motion promotes judicial economy, given the complexity of this case and number of defendants charged.

Dated: July 24, 2015

Respectfully Submitted,
OMAR DE JESUS CASTILLO
By Counsel

/s/

Katherine Martell, VSB 77027
kmartell@firstpointlaw.com
FirstPoint Law Group P.C.
10615 Judicial Drive, Suite 101
Fairfax, VA 22030
Tel: 703-385-6868
Fax: 703-385-7009
Counsel for Defendant
Omar Dejesus Castillo

/s/

Meredith M. Ralls, VSB 82548
mralls@oldtownadvocates.com
Old Town Advocates P.C.
9306 Grant Avenue
Manassas, VA 20110
Tel: 571-292-5651
Fax: 703-361-6400
Counsel for Defendant
Omar Dejesus Castillo

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2015 I will file the foregoing with the Clerk of Court via CM/ECF, which will then generate a Notice of Electronic Filing (NEF) for all counsel of record.

/s/

Katherine Martell, VSB 77027
kmartell@firstpointlaw.com
FirstPoint Law Group P.C.
10615 Judicial Drive, Suite 101
Fairfax, VA 22030
Tel: 703-385-6868
Fax: 703-385-7009
Counsel for Defendant
Omar Dejesus Castillo

/s/

Meredith M. Ralls, VSB 82548
mralls@oldtownadvocates.com
Old Town Advocates P.C.
9306 Grant Avenue
Manassas, VA 20110
Tel: 571-292-5651
Fax: 703-361-6400
Counsel for Defendant
Omar Dejesus Castillo